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9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 J. BRUCE ALVERSON, LTD., ) Case No. 2:10-cv-01716-PMP-GWF  
12 Petitioner, )  
13 v. )  
14 U.S. DEPARTMENT OF LABOR, )  
15 Respondent. )

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17 **UNOPPOSED MOTION FOR EXTENSION OF TIME**  
(Second Request)

19 COMES NOW the U.S. Department of Labor, by and through Daniel G. Bogden, United  
20 States Attorney, and Adam M. Flake, Assistant United States Attorney for the District of Nevada,  
21 and respectfully requests this Court grant a fourteen-day extension of time of all deadlines in this  
22 matter.

23 In support of this motion, the United States submits as follows:

24 1. Current deadlines are: Government's Response to the Petition and submission of  
25 Administrative Record due May 18, 2011. Petitioner's Opening Brief due June 17, 2011.  
26 Government's Brief due July 18, 2011. Petitioner's Reply due July 28, 2011.

2. If this motion is granted, deadlines in this case would be as follows:

Government's Response to the Petition and submission of Administrative Record due June 1, 2011. Petitioner's Opening Brief due July 1, 2011. Government's Brief due August 1, 2011. Petitioner's Reply due August 11, 2011.

3. The parties wish to discuss settlement in this case. On May 12, 2011, opposing counsel, Shilo Borja, indicated she does not oppose this motion for extension of time.

4. Granting a fourteen-day extension of time to allow the parties to discuss settlement is both in the interest of the parties and is also in the interest of preserving judicial resources.

5. This instant motion is filed in good faith and not for the purposes of delay.

WHEREFORE, the United States respectfully requests this Court grant a fourteen-day extension of time of all deadlines in this matter.

DATED this 13th day of May 2011.

Respectfully submitted,

DANIEL G. BOGDEN  
United States Attorney

/s/ Adam Flake  
ADAM M. FLAKE  
Assistant United States Attorney

IT IS SO ORDERED:

Philip M. Orr

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**PHILIP M. PRO, U.S. DISTRICT JUDGE**

DATED: May 16, 2011

## PROOF OF SERVICE

I, Adam M. Flake, AUSA, certify that the following individuals were served with the  
**UNOPPOSED MOTION FOR EXTENSION OF TIME** on this date by the below identified  
method of service:

## **Electronic Case Filing**

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Attorneys for Petitioner.

DATED this 13th day of May 2011.

/s/ Adam Flake  
ADAM M. FLAKE  
Assistant United States Attorney